

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NADGIA DIXON, individually
and on behalf of all other persons
similarly situated who were employed
by NBCUniversal Media LLC with
one of its affiliated cable tv stations,

Plaintiffs,

v.

NBCUNIVERSAL MEDIA LLC and
OXYGEN MEDIA LLC,

Defendants.

12 Civ. 7646 (PAE)

ECF Case

**NOTICE OF MOTION TO COMPEL
ARBITRATION AND DISMISS THE
COMPLAINT, OR IN THE
ALTERNATIVE, TO COMPEL
ARBITRATION AND STAY
PROCEEDINGS**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support of Defendants' motion to compel arbitration and dismiss the complaint, or in the alternative, to compel arbitration and stay proceedings, and the accompanying Declaration of Chelley E. Talbert with annexed Exhibits, and any other submissions as shall be made in support of this motion, Defendants NBCUniversal Media LLC and Oxygen Media LLC, by and through undersigned counsel, shall move this Court before the Honorable Paul A. Engelmayer at the United States Courthouse located at 40 Foley Square, New York, New York 10007, on a date and time this Court deems appropriate, for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) and the Federal Arbitration Act, 9 U.S.C. §§ 1-6, granting Defendants' motion to compel arbitration and dismiss the complaint, or in the alternative, to compel arbitration and stay proceedings, and granting such other relief as this Court may deem just and proper.

Dated: February 19, 2013
New York, New York

Respectfully submitted,

NBCUniversal Media LLC

By: s/Chelley E. Talbert
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Media LLC and Oxygen Media LLC*